

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

)
) Chapter 11
)
) Case No. 22-11068 (JTD)
)
) (Jointly Administered)
)
) Related to Docket Nos. 1632, 1683, 1693, 2235 and 29773
)
)
)
)

**DECLARATION OF DAVID PATTON IN SUPPORT OF DO KWON'S MOTION TO
ENFORCE ORDER GRANTING MOTION OF PYTH DATA ASSOCIATION FOR
RELIEF FROM THE AUTOMATIC STAY (ECF 1693)**

I, David Patton, hereby declare as follows under penalty of perjury pursuant to 28 U.S.C. § 1746, and make this declaration to the best of my knowledge and belief:

1. I am a partner at Hecker Fink LLP and counsel for Do Kwon.
2. I submit this declaration in support Do Kwon's Motion to Enforce Order Granting Motion of Pyth Data Association for Relief from the Automatic Stay (ECF 1693).
3. Attached as Exhibit A hereto is a true and accurate copy of the September 6, 2024 letter from David Feder, counsel for Pyth Data Association, to Joseph Evans, counsel for the Official Committee of Unsecured Creditors ("Committee") of Terraform Labs Pte. Ltd. et al.
4. Attached as Exhibit B hereto is a true and accurate copy of the September 7, 2023 to October 20, 2023 email chain between PYT Foundation and Allison Jetton, counsel for Mr.

¹ The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

Kwon and Lee Daeun, regarding the claim process for replacement PYTH tokens.

5. Attached as Exhibit C hereto is a true and accurate copy of the Pyth Consulting Agreement between Tribal Invest Corp. and Mr. Kwon, dated May 18, 2021.

6. Attached as Exhibit D hereto is a true and accurate copy of the Restricted Token Grant Agreement between Tribal Invest Corp. and Mr. Kwon, dated May 18, 2021.

7. Attached as Exhibit E hereto is a true and accurate copy of the Amendment to the Restricted Token Grant Agreement Tribal Invest Corp. and Mr. Kwon, dated May 23, 2022.

8. Attached as Exhibit F hereto is a true and accurate copy of Mr. Kwon's May 17, 2022 resignation letter to the Pyth Data Association Board of Directors.

9. Attached as Exhibit G hereto is a true and accurate copy of the December 14, 2022 power of attorney granted by Mr. Kwon to Ms. Daeun.

10. Attached as Exhibit H hereto is a true and accurate copy of the November 21, 2023 to November 28, 2023 email chain between Ms. Jetton and Synaps regarding the replacement PYTH token verification process.

11. Attached as Exhibit I hereto is a true and accurate copy of the November 30, 2023 email chain between Ms. Jetton and representatives for the PYT Foundation.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: New York, New York
February 27, 2025



David Patton